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August 18, 2020

VIA CM/ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bo Mao, No. 1:19-cr-00392-PKC

Dear Judge Chen:

We represent the defendant, Professor Bo Mao, in the above-captioned criminal case. We write with the consent of the Government to respectfully request an additional four-week adjournment of the date to file pre-trial motions. The resulting schedule would have the motions filed on September 18, 2020, responses filed by October 16, 2020, and replies filed by November 18, 2020.

We thank the Court in advance for its courtesy in this regard.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Morris J. Fodeman

Morris J. Fodeman
Michael S. Sommer

THOMPSON & KNIGHT LLP

s/ Richard B. Roper, III

Richard B. Roper

Counsel for Professor Bo Mao

cc: All Counsel of Record (via CM/ECF)